

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS ANDERSON, *et al.*,

Plaintiffs,

v.

UNITED AIRLINES, INC., *et al.*,

Defendants.

Case No. 23-CV-00989

Honorable Matthew F. Kennelly

JOINT MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7.1, Plaintiffs¹ and Defendants,² by and through their undersigned counsel, respectfully request leave to file excess pages in connection with any motion to dismiss briefing. In support of this request, the parties state as follows:

1. On January 19, 2023, Plaintiffs—30 individuals—filed their Complaint, spanning over 60 pages and 320 paragraphs, alleging eleven causes of action, against 32 Defendants. ECF Nos. 1-2.

¹ “Plaintiffs” are the following individuals: Thomas Anderson, James Breitsprecher, Lora Bauer, Kevin Campbell, David Catala, James Curtis, Nicholas Decker, Aimee Doll, Tom Floyd, Kevin Hendershot, Thad Krupa, Kenneth Locke, Brenda Mallett, Brenda Marsden, Sylvia Fitch-McConnell, Michele Miller, John Morris, Carole O’Kobrick, Stephanie Pati, Frank Quintas, Paul Rozell, Darleen Shanley-Gilbert, Richard Sherlock, Randy Sikora, Charles Snyder, John Sullivan, Doug Turner, Rhett Wolff, James Zietlow, and Kevin Zwierko.

² “Defendants” are United Airlines, Inc. (“United”), Scott Kirby, Brett J. Hart, Kate Gebo, Josh Earnst [sic], Gregory Hart, Linda JoJo, Gerald Laderman, Andrew Nocella, Janet Lamkin, Jonathan M. Roitman, John Slater, Torbjorn J. Enqvist, Theresa Fariello, Sasha Johnson, Bryan Quigley, Kirk Limacher, Edward M. Philip, Carolyn Corvi, Matthew Friend, Michael J. Hamilton, Barney Harford, Michele J. Hooper, Todd M. Insler, Walter Isaacson, Richard Johnsen, James A.C. Kennedy, Edward L. Shapiro, David J. Vitale, James M. Whitehurst, and Laysha Ward.

2. By separate motion, the parties have moved the Court for an order extending Defendants' time to answer or otherwise plead up to and including April 23, 2023, and setting a briefing schedule for any motion to dismiss. Joint Mot. for Extension of Time [ECF No. 8]

3. Under the Local Rules, all motions, responses in opposition, and replies in support thereto cannot exceed 15 pages absent leave of Court. N.D. ILL. L. R. 7.1.

4. Defendants intend to submit a consolidated motion to dismiss Plaintiffs' Complaint, however, in light of the number of parties, claims, and defenses, the parties seek leave to file additional pages. Specifically, the parties request the Court allow briefs of 25 pages for any motion to dismiss and response thereto, and 20 pages for any reply.

5. There is good cause for the Court to grant the parties' request as the current page limits will not permit the parties to fully and properly convey their arguments given the number of claims and parties.

Dated: February 23, 2023

Respectfully submitted,

/s/ Jordan M. Matthews

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/s/ John M. Pierce

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2023, I electronically filed a true and correct copy of the foregoing with the Clerk of Court via CM/ECF, which will send notice of the same to all parties of record. I further certify that I have furnished a true and correct copy of the foregoing to counsel for Plaintiff via electronic mail at jpierce@johnpiercelaw.com.

/s/ Jordan M. Matthews
Jordan M. Matthews